

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

UNITED STATES OF AMERICA

V.

MARCO ANTONIO DELGADO

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NO. 13-CR-00370-DCG

DEFENDANT'S AMENDED PROPOSED EXHIBIT LIST

Exhibit No.	Description	Offered	Admitted	Gov't Objection
1.	Letter-Federal Electricity Commission Official, Doc. No. SCC/2011/067, 03/24/11-ENGLISH			
1a.	Letter-Federal Electricity Commission Official, Doc. No. SCC/2011/067, 03/24/11-SPANISH			
2.	Letter of Presentation Proposal, 10/20/09-ENGLISH			
2a.	Letter of Presentation Proposal, 10/20/09-SPANISH			
3.	Letter from GIREUD to EUGENIO, 05/11/10-ENGLISH			
3a.	Letter from GIREUD to EUGENIO, 05/11/10-SPANISH			
4.	Letter Federal Electricity Commission, Official Doc. No. SCC/2011/063, 02/18/11-ENGLISH			
4a.	Letter Federal Electricity Commission, Official Doc. No. SCC/2011/063, 02/18/11-SPANISH			
5.	Letter from Marco Delgado to Ramos Elorduy, 03/03/10-ENGLISH			
5a.	Letter from Marco Delgado to Ramos Elorduy, 03/03/10-SPANISH			
6.	Minutes for the Extraordinary Session Number 10/2009, 12/23/09-ENGLISH			
6a.	Minutes for the Extraordinary Session Number 10/2009, 12/23/09-SPANISH			

7.	First Amendment Agreement to the Contract of Acquisition No. FAGP-001/2009 with Annex 1 & 2, 12/23/09-ENGLISH			
7a.	First Amendment Agreement to the Contract of Acquisition No. FAGP-001/2009 with Annex 1 & 2, 12/23/09-SPANISH			
8.	Contract for Guarantee Services Guaranteeing Functionality of Gas Turbine Generators (Long Term Service Agreement), 01/06/10-ENGLISH			
8a.	Contract for Guarantee Services Guaranteeing Functionality of Gas Turbine Generators (Long Term Service Agreement), 01/06/10-SPANISH			
9.	Annex D- Ceremony of Presentation and Opening of Proposals/Bi, 10/20/09-ENGLISH			
9a.	Annex D- Ceremony of Presentation and Opening of Proposals/Bi, 10/20/09-SPANISH			
10.	Annex E- Award of Contract-ENGLISH			
10a.	Annex E- Award of Contract-SPANISH			
11.	Annex F- Payment Schedule for Gas Turbine Generators and Stem Turbine Generator, 12/07/09-ENGLISH			
11a.	Annex F- Payment Schedule for Gas Turbine Generators and Stem Turbine Generator, 12/07/09-SPANISH			
12.	Annex G- Agreement for an Extension of the Signature of the Contract for the Acquisition and Services Guaranteeing the Functionality Turbine Generators, 12/06/09-ENGLISH			
12a.	Annex G- Agreement for an Extension of the Signature of the Contract for the Acquisition and Services Guaranteeing the Functionality Turbine Generators, 12/06/09-SPANISH			

13.	ANNEX Q-Map of site location-ENGLISH			
13a.	ANNEX Q- Map of site location-SPANISH			
14.	Annex K-Form for written declaration by residents abroad that the winning bidder awarded the contract must submit prior to the execution of the contract; Request for Opinion with regards to the compliance of Fiscal Obligations related to Contracting with the Federal Government and the States, 12/2009-ENGLISH			
14a.	Annex K-Form for written declaration by residents abroad that the winning bidder awarded the contract must submit prior to the execution of the contract; Request for Opinion with regards to the compliance of Fiscal Obligations related to Contracting with the Federal Government and the States,12/2009-SPANISH			
15.	Annex L- Publication of Bid in the <i>Diario</i> , 03/26/09-ENGLISH			
15a.	Annex L- Publication of Bid in the <i>Diario</i> , 03/26/09-SPANISH			
16.	Annex R- Program of RFP Events-ENGLISH			
16a.	Annex R- Program of RFP Events-SPANISH			
17.	Annex S- Payment Schedule for Gas Turbine Generators and Stem Turbine Generator-ENGLISH			
17a.	Annex S- Payment Schedule for Gas Turbine Generators and Stem Turbine Generator-SPANISH			
18.	Annex T with Annex 14-Guarantee of Compliance Form-ENGLISH			
18a.	Annex T with Annex 14-Guarantee of Compliance Form-SPANISH			
19.	Annex U with Annex 13- Guarantees and Conventional Sanctions-ENGLISH			
19a.	Annex U with Annex 13- Guarantees and Conventional Sanctions-SPANISH			

20.	Annex V- Second Agreement for an Extension to the Signature of the Contract for the Acquisition and Services Guaranteeing the Functionality of Turbine Generators-ENGLISH			
20a.	Annex V- Second Agreement for an Extension to the Signature of the Contract for the Acquisition and Services Guaranteeing the Functionality of Turbine Generators-SPANISH			
21.	Annex 13- Guarantees and Conventional Sanctions-ENGLISH			
21a.	Annex 13- Guarantees and Conventional Sanctions-SPANISH			
22.	Miranda Form			Yes
23.	ROI 1			Yes
24.	ROI 16			Yes
25.	Consent to Search I-Phone			Yes
26.	Cerrito Feliz Purchase Docs			
27.	Charlotte's Docs			
28.	Memorandum of Understanding-FGG			
29.	Mack Massey			
30.	Linda Medlock Scans			
31.	CFE Wire Trans and Rerouting 03/03/10			
32.	Mits Correspondence 10/28/09			
33.	Rudolph Docs			
34.	Turks and Caicos- Rutley Affidavit, 01/28/13			
35.	Email Re: First Caribbean Bank Docs from AUSA Arreola to Former Defense Counsel, 07/17/13			Yes
36.	Email Re: Discovery from AUSA Arreola to Former Defense Counsel, 09/25/13			
37.	Carnegie Melon Response to Summons, 12/04/12			
38.	Email,Gireud 07/01/11			
39.	Land Rover Documents			
40.	MVD-New Mexico Records			
41.	Direct Buy Response to Summons			
42.	Gireud Thumb Drive			

43.	Mitsubishi Contract-SPANISH 01/24/12			
44.	FGG Correspondence Re: Wells Fargo Credit, 05/11/10			
45.	FGG, SPANISH 03/03/10			
45a.	FGG, ENGLISH, 03/03/10			
46.	FGG Invoice, 06/29/10 SPANISH			*
46a.	FGG Invoice, 06/29/10 ENGLISH			*
47.	Fiduciary Office, 03/07/12 SPANISH			*
47a.	Fiduciary Office, 03/07/12 ENGLISH			*
48.	FGG Economic Proposal-SPANISH			
48a.	FGG Economic Proposal-ENGLISH			
49.	CFE Sec 6 Contract			
50.	Amendment 1-FGG & Mitsubishi 04/23/10			
51.	CFE Correspondence Re: Financing 03/01/12			
52.	FGG POWER OF ATTORNEY 03/08/12			
53.	SPECIAL POWER OF ATTORNEY- MD 07/13/09			
54.	FGG Business Entity Information			
55.	Three Party Agreement for CFE Agua Prieta II and Book of Draft			Yes
56.	CFE Correspondence Re: Contract 02/18/11			*
57.	CFE Correspondence Re: Contract 03/24/11			
58.	Amendment-Re: CFE and FGG, 04/22/11-SPANISH & ENGLISH			*
59.	FGG Corres. Re: Financing Offer			*
60.	FGG Corres. Re: Receipt of Payment 07/15/09			
61.	Email From MD to FJG Re: Breach of Contract 03/30/11			
62.	Email from MD to Kevin Beddard Re: Confidential Info Request 03/17/11			
63.	Email from FJG to MD Re: Sulzer Merged Agreement 04/15/11			Yes
64.	Email from FJG to MD Re: Sulzer Merged Agreement ii 04/22/11			Yes
65.	Email from FJG to MD Re: Assignment of Collections to MPSA 04/15/11			
66.	Phone Texts Mobile: 915-929-1930, I- Phone: 915-667-1882 SPANISH			

66a.	Phone Texts Mobile: 915-929-1930, I-Phone: 915-667-1882 ENGLISH			
67.	Mitsubishi Corres. To FJG Re: Equipment Contract 01/12/10			
68.	Photo Taos Condo			
69.	Photos of Jeep, Range Rover			
70.	Photos of 1109 Cerrito Feliz- 09/27/13			
71.	Bank Records Re: FGG Account, IOLTA Account, MD Account, PMA Account, and Narvaez Account			
72.	ROI 12 02/16/12 Re: Meeting with SA and MD on 10/28/11			Yes
73.	Bank Records from Standard Charter: Business Record Affidavit, 10/15/13			
74.	Wells Fargo Records Acct 4733, 01/22/14			
75.	Email Re: Revised Payment Plan 03/25/10			
76.	Email Re: Formal Assignment Request 04/15/11			
77.	Email Re: When to call 03/12/10			
78.	Email Re: CFE Acknowledgement of Formal FGG Request 03/08/10			
79.	Email Re: Format of Wire Transfer 03/26/10			
80.	Email (03/25/10) Re: Color Doc Assignment and correspondence re: Payment to FGG from CFE(03/24/10)			
81.	Email Re: JA Letter (02/11/10) and correspondence re: CFE-FGG Equipment Contract (01/30/10)			
82.	Email (04/06/10) Re: CFE Letter and correspondence to MD from CFE 03/30/10			*
83.	Email Re: Agua-FGG Subcontract 05/10/10			
84.	Email Re: FGG 04/04/10			
85.	Email (03/03/10) Re: MPSAs Protests and correspondence from MPSA (03/03/10)			
86.	Email Re: FGG Collection Right to MPSA 03/30/11 and executed Assignment of Collection Rights			
87.	Email Re: CFE Assignment 03/11/10			

88.	Email Re: FGG-MPSA (04/07/10) and FGG Correspondence Re Payment to MPSA (04/06/10)			
89.	Business Record Affidavit and attachments- Wells Fargo 10/17/13			
90.	MPSA Lawsuit v. FGG, FG, and MD-2012 and Attachments			Yes
91.	Wells Fargo Correspondence Re: Subpoena 11/07/13			
92.	Sulzer v. FGG Original Petition			Yes
93.	Email (06/09/11) Tania Mendez Re: CFE Documents and Executed Amendment of Collection (06/09/11)			Yes
94.	FGG Correspondence to Sulzer (Pardivala) 03/08/11			Yes
95.	FGG Authorization, 06/09/11			Yes
96.	Power of Attorney FGG, 06/10/12			
97.	Order Granting Selzer Motion to Compel, 03/17/13,			Yes
98.	Miller First Supp Responses to RFP, 06/17/13			Yes
99.	Email Re: Agua Prieta Project 01/05/10			
100.	Email (01/12/10) Re: FGG Clarifications Letter and FGG Correspondence (01/12/10)			
101.	Email Re: Itinerary 01/12/10			
102.	Email Re: Agua Prieta II 02/07/11			
103.	Email Re: FGG TSUSH Letter of Intent Draft 02/17/11			Yes
104.	Email Re: Contract for Services 02/17/011			
105.	Email Re: FGG-FEB-11 02/21/11			
106.	Email Re: AGUA-FGG Urgent Clarification of Equipment Title, 02/24/11			
107.	Email Re: Borrador a Kevin 02/25/11			
108.	Email Re: Review of Letter to Kevin 02/28/11			
109.	Email Re: Questions Regarding Pledge 02/28/11			
110.	Email Re: AGUA-FGG 2 nd Delay Notice 03/11/11			
111.	Email Re: Agua Prieta 04/08/11			

112.	Email Re: AGUA-FGG Breach of Contract: Request for Authorization for the Assignment of collection rights 04/10/11			
113.	Email Re: agreement Agua Prieta 05/08/09			*
114.	Email Re: MX-311N Answers to Questions 05/30/11			*
115.	Email Re: Collection of Rights,03/30/11			
116.	Exclusivity and Non-Circumvention Agreement Thomassen Amcot-FGG, 04/20/09			
117.	CFE Correspondence 05/18/11			*
118.	Revocation of Special Power of Attorney – FJG 04/14/10			
119.	FGG Correspondence Re: Well Fargo 05/11/10			
120.	FGG Correspondence Re: 2 nd CFE Payment Disbursements- Agua Prieta II 07/15/10			
121.	FGG Correspondence 03/22/10			
122.	Addendum to Teaming Agreement FGG and Mitsubishi 08/11/09			
123.	FGG Correspondence, 12/10/09			*
124.	FGG Correspondence Re: Confidentiality Agreement 07/14/09			*
125.	Email Re: Meeting 03/29/11			*
126.	FGG Correspondence Beddard to Miller, Re: Agua Prieta II-Various, 11/11/10			*
127.	CFE Correspondence CFE to Mits. 08/26/11			*
128.	Email Re: Collection Rights 03/30/11			
129.	Email Re: Obtaining Counsel, 04/08/11			
130.	Email Re: Transportation and Disaster 07/21/11			
131.	FGG Correspondence Re: Contract 03/28/11			
132.	CFE Correspondence 10/26/10			
133.	CFE Correspondence 03/03/10			
134.	FGG 2010 1099 Tax Form			
135.	FGG 2011 1099 Tax Return			
136.	Email to Altamura from Kevin Beddard 3/28/11 with FGG Correspondence 03/28/11 SPANISH			

136a.	Email to Altamura from Kevin Beddard 3/28/11 with FGG Correspondence 03/28/11- ENGLISH			
137.	Linda Medlock emails			
138.	John Adams Passport			
139.	John Adams Border Crossing			
140.	Bancomext			
141.	Notary Book 1- Arais Davila			
142.	Notary Book 2- Arais Davila			
143.	Credit Card Transactions Provided by Linda Medlock			
144.	FGG Ent LLC Provided by F. Gireud, 12/16/09			
145.	Emails Provided by F. Gireud			*
146.	1099's Provided by F. Gireud			
147.	Def FJG Responses			Yes
148.	Def FJG Supp Response to RFP			Yes
149.	Mace Miller Object and Res to RFP Re: Venue			Yes
150.	Sulzer Docs Re: Responses to RFP 10/31/12			Yes
151.	Correspondence From Haynes & Boone, 11/01/12			Yes
152.	Correspondence dated 11/29/11 to Linda Medlock from Steve James Re: IRS			Yes
153.	Correspondence and draft to Marco Delgado from Linda Medlock w/IRS Docs 11/10/11			
154.	Correspondence to Linda Medlock, 07/05/11 from Susan Urbietta, Atty Re: Child Support and additional child support documents			Yes
155.	Documents from Bowdoin College			
156.	Subcontracto de Adquisicion de Bienes y Anexos, 1216- SPANISH			
156a.	Subcontracto de Adquisicion de Bienes y Anexos, 1216- ENGLISH			
157.	Travel Documents			
158.	Special Power of Attorney, 01/11/2010			
159.	Ponce Email with Anexo S and Chart, 03/15/10			
160.	John Adams Cell Records from Dec 2009 to Jan 2010			
161.	CFE AUDIT			Yes

162.	Discovery Letter, 05/09/16			Yes
163.	Gov't Proffer Letters, 05/09/16, 09/12/12, 08/01/12, 11/06/12			Yes
164.	"Contrato De Adquisiciones" with Official Stamps, 01/06/10			
165.	ROI'S 9, 17, 19, 24, 33, 34, <i>Brady/Giglio</i> Source			Yes
166.	Corres Skipplings Rutley, 03/23/10			
167.	Checks to Mace Miller and Gireud, 05/20/09			
168.	Check Linda Medlock, 04/19/10			
169.	Checks to Joe Montes, Liliana Narvaez, Ray Velarde, Chris Parker, 2012;			Yes
170.	Order for Issuance of Witness Subpoena <i>Ad Testificandum and Duces Tecum</i> for Mitsubishi Power Systems Americas, Inc.'s Custodian of Records, March 4, 2016			Yes
171.	Order for Issuance of Witness Subpoena <i>Ad Testificandum and Duces Tecum</i> for Fernando Gireud, March 4, 2016			Yes
172.	Mitsubishi/CFE Agreement October 2013			Yes
173.	Linda Medlock EMAILS			

Respectfully Submitted,

MAUREEN SCOTT FRANCO
FEDERAL PUBLIC DEFENDER

/S/

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